

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

SAKET CHAUDHARI AND SATYENDRA CHAUDHARI,  Plaintiffs,  v.  MATTHEW PARKER, PARKER CONSULTING SERVICES, INC., AND JOHN DOES (1- 10)(representing unknown liable defendants),  Defendants.	Case No. 2:20-cv-01609-CCC-JSA  Electronically Filed  CERTIFICATION OF ANDREW C. SAYLES, ESQ., IN SUPPORT OF MOTION FOR SUMMARY JUDGMENT AND TO DISMISS COMPLAINT.
---	--

I, ANDREW C. SAYLES. ESQ., of full age, hereby certifies as follows:

1. I am an attorney at law of the State of New Jersey and am a partner with the law firm of Moreira Sayles Ramirez LLC, attorneys for Defendants Matthew Parker and Parker Consulting Services, Inc. (“Defendants”). As such, I am fully familiar with the facts as set forth herein. I submit this Declaration in support of Defendants Notice of Motion for Summary Judgment.

2. Plaintiffs were Defendants in a prior litigation in the Circuit Court for the Second Judicial District of Jefferson County, Florida, captioned J.D. James, Inc. d/b/a Nature Bridges v. Saket Chaudhari and assigned Case No. 17000163CA (“Florida Action”). Therein, Plaintiff Saket Chaudhari, filed a Counterclaim against the plaintiff, J.D. James,

Inc., d/b/a Nature Bridges (“Nature Bridges”). A true and accurate copy of the Counterclaim filed by Plaintiff Saket Chaudhari in the Florida Action (“Counterclaim”) is attached hereto as **Exhibit A**.

3. Following a five-day trial, Nature Bridges prevailed on its claims for breach of contract and non-payment against Saket Chaudhari. A certified copy of the Final Judgment of November 15, 2018 entered in Nature Bridges’ favor is attached hereto as **Exhibit B**.

4. Thereafter, the court in the Florida Action subsequently entered a Supplemental Final Judgment for attorneys’ fees and costs in favor of Nature Bridges, a certified copy of which is attached hereto as **Exhibit C**.

5. On November 1, 2018, during the trial in the Florida Action, the court entered a directed verdict dismissing the Counterclaim. A true and accurate copy of the transcript of the Florida Action trial proceedings of November 1, 2018, as provided by Plaintiffs as part of their appeal to the Third Circuit, is attached hereto as **Exhibit D**.

6. Defendant Matthew Parker was deposed on February 21, 2018 during discovery in the Florida Action. A true and accurate copy of his deposition transcript in the Florida Action is attached hereto as **Exhibit E**.

7. Plaintiff Saket Chaudhari was deposed in the Florida Action on February 22, 2018. A true and accurate copy of his deposition transcript in the Florida Action is attached hereto as **Exhibit F**.

8. Plaintiff Saket Chaudhari appealed the dismissal of his Counterclaim and the entry of final judgment in the Florida Action. That appeal was dismissed on August 26, 2019. A true and accurate copy of Florida First District Court of Appeal Order of Dismissal is attached hereto as **Exhibit G**.

**MOREIRA SAYLES RAMIREZ LLC**

By: /s/ Andrew C. Sayles  
Andrew C. Sayles, Esq.  
*Attorneys for Defendants Matthew  
Parker and Parker Consulting  
Services, Inc.*

Dated: June 2, 2023